

**EXHIBIT 1**

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PHILADELPHIA INDEMNITY INSUR-  
ANCE COMPANY, a Pennsylvania corpora-  
tion, as subrogee of DH&G, LLC.,

Plaintiffs,

vs.

HEWLETT-PACKARD COMPANY,

Defendant.

Case No.: 2:19-cv-00138-RSM

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Plaintiff Philadelphia Indemnity Insurance Com-  
pany, as subrogee of DH&G, LLC, ("Plaintiff" or "Philadelphia") provides its initial disclosures  
to Defendant Hewlett-Packard Company ("HP"). Philadelphia reserves the right to supplement or  
amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about  
the nature and details of HP's investigation and defenses.

**1. List of Witnesses**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), Philadelphia discloses the following individu-  
als likely to have discoverable information that may be used to support Philadelphia's allegations  
and claims. Philadelphia reserves the right to amend or supplement these disclosure, including as  
provided by Fed. R. Civ. P. 26(e). The following disclosures do not include persons whose testi-

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mony is likely to be used solely for impeachment, rebuttal, or expert witness testimony, who will be disclosed in accordance with the schedule set by the Court.

Name	Contact Information	Nature of Witness' Knowledge
Russell Hirsch, DH&G, LLC	10532 35 <sup>th</sup> Avenue NE Seattle, WA. 98105	Mr. Hirsch has knowledge of the property that suffered fire damage (better known as the Bluffs at Evergreen, 2 West Casino Road, Everett, WA 98204), the subsequent insurance claim with Philadelphia Ins., and other relevant information.
Kimberly Bucy Coast Property Management	2829 Rucker Avenue Everett, WA 98201	Ms. Bucy is a property manager with Coast Property Management and has knowledge relating to Bluffs at Evergreen, the subsequent insurance claim with Philadelphia Ins., and other relevant information.
John Gartling Philadelphia Insurance Co.	640 Plaza Drive, Suite 200 Highlands Ranch, CO 81029	Mr. Gartling is a senior property claims specialist with Philadelphia Insurance Co. and has knowledge of the insurance claim made by DH&G for the fire that is the subject of this litigation.
John Smith Philadelphia Insurance Co.	PO Box 950 Bala Cynwyd, PA 19004	Mr. Smith is a senior subrogation examiner with Philadelphia Insurance Co. and has knowledge of the insurance claim made by DH&G, LLC. for the fire that is the subject of this litigation.
Steve DeKoekkoek Engle Martin & Associates	4100 194 <sup>th</sup> Street SW, Ste 120 Lynnwood, WA 98036	Mr. DeKoekkoek is an executive general adjuster with Engle Martin & Associates and has knowledge of the insurance claim made by DH&G, LLC., the adjustment of the insurance claim, and other relevant information.

<p>1 JS Held Construction Consult- 2 ing 3 4</p>	<p>50 Jericho Quadrangle Suite 117 Jericho, NY 11753</p>	<p>JS Held has information re- lated to the repairs and repair costs for the damages sus- tained by DH&amp;G, LLC as a result of the fire that is the subject of this litigation.</p>
<p>5 Belfor USA Group, Inc./ 6 Belfor Property Restoration 7</p>	<p>4320 South 131<sup>st</sup> Place Suite 100 Seattle, WA 98168</p>	<p>Belfor has information related to the repairs and repair costs for the damages sustained by DH&amp;G, LLC as a result of the fire that is the subject of this litigation.</p>
<p>8 Seth Tolbert 9 Wrecking Ball Demolition 10 11</p>	<p>3310 Chestnut St. Everett, WA 98201</p>	<p>Mr. Tolbert is a project man- ager for Wrecking Ball and has information related to the repairs and repair costs for the damages sustained by DH&amp;G, LLC as a result of the fire that is the subject of this litigation.</p>
<p>12 Mike Lawrence 13 Thermatech Northwest, Inc. 14 15</p>	<p>10312 Sales Road South Lakewood, WA 98499</p>	<p>Mr. Lawrence is a project manager for Thermatech and has information related to the repairs and repair costs for the damages sustained by DH&amp;G, LLC as a result of the fire that is the subject of this litigation.</p>
<p>16 Mark Marcell 17 Construction Group Int'l 18 19</p>	<p>19407 144<sup>th</sup> NE, Building D, Woodinville, WA 98072</p>	<p>CGI and Mr. Marcell have in- formation related to the repairs and repair costs for the dam- ages sustained by DH&amp;G, LLC as a result of the fire that is the subject of this litigation.</p>
<p>20 American Floors and Blinds 21 22</p>	<p>PO Box 896 Renton, WA 98057</p>	<p>American Floors has informa- tion related to the repairs and repair costs for the damages sustained by DH&amp;G, LLC as a result of the fire that is the subject of this litigation.</p>
<p>23 Eva's Cleaning Services 24 25</p>	<p>12303 Harbour Pointe Blvd. Apartment E 202 Mukilteo, WA 98275</p>	<p>Eva's has information related to the repairs and repair costs for the damages sustained by DH&amp;G, LLC as a result of the fire that is the subject of this litigation.</p>

1	Mr. Rooter Plumbing	2000 South 116 <sup>th</sup> Street Seattle, WA 98168	Mr. Rooter has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.
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4	Direct Carpet Cleaning	1429 Avenue D, PMB 531 Snohomish, WA 98290	Direct Carpet has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.
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8	Dunn Lumber Company	3801 Latona Avenue NE Seattle, WA 98105	Dunn has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.
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11	Elite Resurfacing	PO Box 2304 Sumner, WA 98390.	Elite has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.
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15	Guardian Security Services	10924 Mukilteo Speedway, Suite 1 PMB #229 Mukilteo, WA 98275	Guardian has information related to security services provided during the repair of the property that is the subject of this litigation.
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18	Tick-Tock Junk Removal	12345 Lake City Way NE, #379 Seattle, WA 98125.	Tick-Tock has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.
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22	Jeff Sweazea Insite Builders	10532 35 <sup>th</sup> Avenue NE Seattle, WA 98125	Mr. Sweazea is a construction manager with Insite Builders and has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.
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Everett Public Works 3101 Cedar Street  
Everett, WA 98201

Everett Public Works has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.

Michael Smith 24376 Network Place  
Amec Foster Wheeler Environment & Infrastructure, Inc. Chicago, IL 60673

Mr. Smith is a project manager with Amec Foster Wheeler Environment & Infrastructure, Inc., and has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.

Snohomish County Public Utility District No. 1.

Snohomish has information related to the cost of utilities stemming from the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.

Lynn Yevrovich, deceased Formerly of Unit E101  
2 West Casino Road  
Everett, WA 98204

Ms. Yevrovich is presumed to have had information related to the apartment unit of the area of fire origin, the habits of the tenants, the events of the day of the fire and other relevant information.

Mark Davis, deceased Formerly of Unit E101  
2 West Casino Road  
Everett, WA 98204

Mr. Davis is presumed to have had information related to the cause of the fire, the events of the day of the fire, and other relevant information.

Officer Ryan Hanks, Detective 3002 Wetmore Avenue,  
Michael Atwood, Fire investigator James McCall  
Everett Police Department

These three gentlemen with the Everett Police Department have knowledge and information related to the fire at the Bluffs at Evergreen, as well as knowledge and information of their subsequent investigation into the cause of the fire, interviews with witnesses, and other relevant information.

Eric Hicks  
Everett Fire Department

2930 Wetmore Avenue #7-a,  
Everett, WA 98201

Mr. Hicks is the assistant fire marshal with the Everett fire department and has knowledge and information related to the fire at the Bluffs Apartments, as well as his subsequent investigation into the cause of the fire.

Andrew Paris  
Jensen Hughes Company

23109 55<sup>th</sup> Avenue W.  
Mountlake Terrace, WA 98043

Mr. Paris is a senior electrical engineer with Jensen Hughes Company and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Jeff Harris  
Jensen Hughes Company

23109 55<sup>th</sup> Avenue W  
Mountlake Terrace, WA 98043

Mr. Harris is an expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Ken Rice  
Jensen Hughes Company

23109 55<sup>th</sup> Avenue W.  
Mountlake Terrace, WA  
98043

Mr. Rice is a senior fire investigator, formerly with Jensen Hughes Company, and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Paul Way  
Jensen Hughes Company

23109 55<sup>th</sup> Avenue W.  
Mountlake Terrace, WA  
98043

Mr. Way is a director and technical manager with Jensen Hughes Company and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Sebastian Scheiff  
Jensen Hughes Company

23109 55<sup>th</sup> Avenue W.  
Mountlake Terrace, WA  
98043

Mr. Scheiff is a senior electrical engineer, formerly with Jensen Hughes Company, and expert witness who has knowledge and information related to the investigation

into the cause of the fire, as well as expert opinion as to the cause of the fire.

Daren Slee  
Exponent

5401 McConnell Avenue  
Los Angeles, CA 90066

Mr. Slee is a senior managing engineer with Exponent (formerly with Jensen Hughes) and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Quinn Horn  
Exponent

9 Strathmore Road  
Natick, MA 01760

Mr. Horn is a principal engineer with Exponent and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Steve Tarket  
HP, Inc.

3390 E. Harmony Road  
Fort Collins, CO 80528

Mr. Tarket is a program manager and expert witness with HP, Inc. who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

George Hogge  
Engineering Forensics Experts

3136 E. Leland Circle  
Mesa, AZ 85213

Mr. Hogge is a principal forensic electrical engineer with Engineering Forensics Experts and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Samuel Sudler  
Scientific Expert Analysis

1110 Benfield Blvd., Ste B  
Millersville, Maryland, 21108

Mr. Sudler is an electrical engineer with Scientific Expert

Analysis and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.



Don Galler  
Electrical Engineering Solutions

Bedford, MA

Mr. Galler is an electrical engineer with Electrical Engineering Solutions and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Jeff Colwell  
Colwell Consulting

8777 N. Gainey Center Drive  
Suite 178  
Scottsdale, AZ 85258

Mr. Colwell is a principal engineer with Colwell Consulting and expert witness who has knowledge and information related to the investigation into the cause of the fire, as well as expert opinion as to the cause of the fire.

Sherri Benchert  
Home Shopping Network

1 HSN Drive  
St. Petersburg, FL 33729

Ms. Benchert is a senior legal administrator with the Home Shopping Network and has information and knowledge related to Mark Davis' purchase of the HP laptop computer that is alleged to be the cause of the fire in this litigation.

Simplo Technology Co., LTD.

No. 471 Section 2, Bade Rd.  
Hukou Township  
Hsinchu County  
Taiwan 303

Simplo is alleged to have information related to the design, manufacture, function, etc. of components of the subject HP laptop computer.

Samsung Electronics/SDI (and its conglomerates)

40<sup>th</sup> Floor  
Samsung Electronics Bldg. 11  
Seocho-daero 74-gil  
Seocho District  
Seoul, South Korea

## **2. List of Documents and Things**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), Philadelphia hereby discloses the following documents and things in its possession, custody or control that it may use to support its allegations and claims. Philadelphia reserves the right to amend or supplement these disclosures as provided under Fed. R. Civ. P. 26(e).

Category	Location
Jensen Hughes Company expert report (and cited materials)	In Plaintiff's and experts' possession and stored electronically
Plaintiff's damage documentation	In Plaintiff's possession and stored electronically
Lithium ion battery literature	In Plaintiff's and experts' possession and stored electronically
Everett fire department report	In Plaintiff's possession and stored electronically
Everett police department videos	In Plaintiff's possession and stored electronically
Inspection sign-in sheets	In Plaintiff's and experts' possession and stored electronically
Laboratory examination protocols	In Plaintiff's and experts' possession and stored electronically
Jensen Hughes exhibit list	In Plaintiff's and experts' possession and stored electronically
Home Shopping Network file	In Plaintiff's possession and stored electronically
Engle Martin & Associates file (only unprivileged documents)	In Plaintiff's and expert's possession and stored electronically
Philadelphia Ins. Co. file (only unprivileged documents)	In Plaintiff's possession and stored electronically
HP recall notices	In Plaintiff's and experts' possession and stored electronically
All tangible evidence and artifacts retained by Jensen Hughes or others	In experts' possession and stored at a secured location.
News articles related to the fire at Bluffs at Evergreen	In Plaintiff's possession and stored electronically.

### 3. Plaintiffs/Claimants: Damages Calculation

Plaintiff Philadelphia Insurance Company suffered damages in the amount of \$5,693,723.39 when it paid for property damage and business income loss to its insured, DH&G,

1 LLC, stemming from a fire that occurred at DH&G, LLC's property on December 31, 2015.  
 2 Philadelphia Insurance Company paid the damages sustained by its insured pursuant to a policy  
 3 of insurance, policy number PHPK1292044, with effective dates of February 22, 2015 through  
 4 February 11, 2016. Damages were calculated utilizing information and documents gained from  
 5 DH&G, LLC, Engle Martin and Associates, JS Held and other professionals as outlined in the  
 6 damage documentation. The \$5,693,723.9 in damage is broken down as follows:

7 **Building damages:**

- 8 • \$1,302,724.33 demolition and abatement
- 9 • \$20,015.00 architectural and engineering
- 10 • \$4,984.12 industrial hygiene
- 11 • \$3,289,129.00 building rebuild contract
- 12 • \$189,671.96 rebuild change orders
- 13 • \$32,702.95 insured's direct costs
- 14 • \$36,816.06 additional water damage
- 15 • \$40,671.00 final grounds, paved surfaces and signage

16 Building damages total = \$4,916,714.42

17 **Building ordinance and law/code coverage:**

- 18 • \$273,620.01 ordinance and law/code damages

19 Ordinance and law/code damages total = \$273,620.01

20 **Business Income/Extra Expense damages:**

- 21 • \$477,307.00 net rents loss through April
- 22 • \$26,081.96 net rents loss for May and June

23 Business Income and Extra Expense loss totals = \$503,388.96

24 Damage documentation and supports have previously been disclosed and provided to De-  
 25 fendant HP, and include a statement of loss, photographs, demolition and abatement documents,  
 miscellaneous direct costs and water damage documents, surface and signage documents, busi-  
 ness income and rents documents and copies of payment checks.

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**4. Reservation of Rights**

Philadelphia reserves the right to amend or supplement these disclosure as provided by Fed. R. Civ. P. 26(e) and to object to the admissibility of any document or statement herein or in HP's initial disclosures on all bases set forth in the Federal Rules of Civil Procedure, Federal Rules of Evidence, and governing law.

DATED: March 25, 2019.

MacMILLAN, SCHOLZ, & MARKS, P.C.

By: /s/ John R. MacMillan  
JOHN R. MacMILLAN, WSBA #27912  
Of Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I, John R. MacMillan, certify under penalty of perjury under the laws of the United States that, on March 22, 2019, I caused the foregoing document to be served by the method(s) indicated below on the parties listed below:

Geoff Grindeland  
Nikki Carsley  
Lisa Kopecky  
Seamark Law Group  
400 Winslow Way E, Ste 230  
Bainbridge Island, WA 98110  
*Of Attorneys for Defendant*

☐ Via Hand Delivery  
☐ Via US Mail, Postage Prepaid, First Class  
☐ Via Facsimile  
☒ [geoff@seamarklaw.com](mailto:geoff@seamarklaw.com)  
[nikki@seamarklaw.com](mailto:nikki@seamarklaw.com)  
[lisa@seamarklaw.com](mailto:lisa@seamarklaw.com)

DATED: March 25, 2019.

/s/ John R. MacMillan

John R. MacMillan, WSBA #27912  
Of Attorneys for Plaintiff

**EXHIBIT 2**

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

PHILADELPHIA INDEMNITY INSUR- )  
ANCE COMPANY, a Pennsylvania corpora- )  
tion, as subrogee of DH&G, LLC, )

Plaintiff, )

v. )

HEWLETT-PACKARD COMPANY, )

Defendant. )

) Case No.: 2:19-cv-00138-RSM

) PLAINTIFF'S RESPONSES TO DEFEN-  
) DANT'S INTERROGATORIES AND RE-  
) QUESTS FOR PRODUCTION

SUBJECT TO Each and every general objection and each and every specific objection stated herein, plaintiff Philadelphia Indemnity Insurance Company, as subrogee of DH&G, LLC ("Philadelphia Indemnity") hereby responds to defendant's Interrogatories and Requests for Production as set forth below. The written answers and responses shall not be construed as a waiver of any of the general or specific objections raised herein.

**OBJECTIONS TO DEFINITIONS AND PROCEDURES**

1. Overbroad as to Scope. Philadelphia Indemnity has no duty to engage in cumulative or duplicative discovery or, pursuant to Fed. R. Civ. Proc. 33, to provide information that can easily be ascertained from documents produced or that are available from third-party sources and/or that defendant can obtain as readily as Philadelphia Indemnity.

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**ANSWER:** Plaintiff will disclose expert information consistent with the case schedule set forth in the Joint Status Report and Discovery Plan entered in this matter on March 19, 2019.

**INTERROGATORY NO. 8:** *Please identify any person who was a witness to or has knowledge of the Incident, your liability contentions, or your damages, or who otherwise has knowledge relevant to the issues in this case. For each such witness, describe his or her relevant knowledge and identify any documents concerning, involving, or in any way related to the witness's potential testimony.*

**ANSWER:**

Name	Contact Information	Nature of Witness' Knowledge
Russell Hirsch, DH&G, LLC	10532 35 <sup>th</sup> Avenue NE Seattle, WA. 98105	Mr. Hirsch has knowledge of the property that suffered fire damage (better known as the Bluffs at Evergreen, 2 West Casino Road, Everett, WA 98204), the subsequent insurance claim with Philadelphia Ins., and other relevant information.
Kimberly Bucy Coast Property Management	2829 Rucker Avenue Everett, WA 98201	Ms. Bucy is a property manager with Coast Property Management and has knowledge relating to Bluffs at Evergreen, the subsequent insurance claim with Philadelphia Ins., and other relevant information.
John Gartling Philadelphia Insurance Co.	640 Plaza Drive, Suite 200 Highlands Ranch, CO 81029	Mr. Gartling is a senior property claims specialist with Philadelphia Insurance Co. and has knowledge of the insurance claim made by DH&G for the fire that is the subject of this litigation.
John Smith Philadelphia Insurance Co.	PO Box 950 Bala Cynwyd, PA 19004	Mr. Smith is a senior subrogation examiner with Philadelphia



Insurance Co. and has knowledge of the insurance claim made by DH&G, LLC. for the fire that is the subject of this litigation.

Steve DeKoekkoek  
Engle Martin & Associates

4100 194<sup>th</sup> Street SW, Ste 120  
Lynnwood, WA 98036

Mr. DeKoekkoek is an executive general adjuster with Engle Martin & Associates and has knowledge of the insurance claim made by DH&G, LLC., the adjustment of the insurance claim, and other relevant information.

JS Held Construction Consulting

50 Jericho Quadrangle  
Suite 117  
Jericho, NY 11753

JS Held has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.

Belfor USA Group, Inc./  
Belfor Property Restoration

4320 South 131<sup>st</sup> Place  
Suite 100  
Seattle, WA 98168

Belfor has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.

Seth Tolbert  
Wrecking Ball Demolition

3310 Chestnut St.  
Everett, WA 98201

Mr. Tolbert is a project manager for Wrecking Ball and has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.

Mike Lawrence  
Thermatech Northwest, Inc.

10312 Sales Road South  
Lakewood, WA 98499

Mr. Lawrence is a project manager for Thermatech and has information related to the repairs and repair costs for the damages sustained by DH&G, LLC as a result of the fire that is the subject of this litigation.

Mark Marcell  
Construction Group Int'l

19407 144<sup>th</sup> NE, Building D,  
Woodinville, WA 98072

CGI and Mr. Marcell have information related to the repairs and repair costs for the damages sustained by DH&G, LLC

**REQUEST FOR PRODUCTION NO. 37:** *Please produce the complete underwriting file in connection with the Property, including all insurance applications, inspection reports, assessments of risk, correspondence, and appraisals.*

**RESPONSE:** Plaintiff will provide responsive documents.

**REQUEST FOR PRODUCTION NO. 38:** *Please produce all documents you intend to file or submit into evidence at any hearing or trial in this matter.*

**RESPONSE:**

Objection. This request is unduly broad and burdensome and not reasonably calculated to lead to discovery of admissible evidence. In addition, investigation and discovery are incomplete in this matter. Plaintiff will supplement its responses to Defendant's requests upon discovery of additional responsive documents or materials.

DATED: Sept. 6, 2019.

MacMILLAN, SCHOLZ, & MARKS, P.C.

By: 

John R. MacMillan, WSB #27912  
MacMillan Scholz & Marks  
900 SW Fifth Ave., #1800  
Portland, OR 97204  
T: (503) 224-2165  
F: (503) 224-0348  
E: [jmacmillan@msmlegal.com](mailto:jmacmillan@msmlegal.com)  
*Of Attorneys for Plaintiff*

**ATTORNEY CERTIFICATION**

I hereby certify that, to the best of my knowledge, information, and belief formed after a reasonable inquiry, these discovery responses, including any objections, comply with FRCP 26 and applicable law.

DATED: September 6, 2019

By: 

John R. MacMillan, WSBA #27912  
MacMillan, Scholz & Marks, PC  
Attorneys for Plaintiff

**VERIFICATION BY PLAINTIFF**

On behalf of Philadelphia Indemnity Insurance Company, I declare under penalty of perjury under the laws of Washington and the United States that these discovery responses are complete and correct.

DATED: \_\_\_\_\_ at \_\_\_\_\_  
(date) (city, state)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

**CERTIFICATE OF SERVICE**

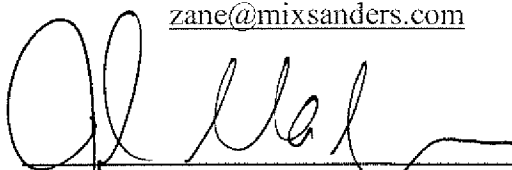
I, John R. MacMillan, certify under penalty of perjury under the laws of the United States that, on the date set forth below, I caused the foregoing document to be served by the method(s) indicated below on the parties listed below:

Kenneth M. Roessler  
Mix Sanders Thompson, PLLC  
1420 Fifth Avenue, Suite 2200  
Seattle, WA 98101  
*Of Attorneys for Defendant*

- ☐ Via Hand Delivery  
☒ Via US Mail, Postage Prepaid, First Class  
☐ Via Facsimile  
☐ Via E-Mail:

[ken@mixsanders.com](mailto:ken@mixsanders.com)  
[cbetke@coughlinbetke.com](mailto:cbetke@coughlinbetke.com)  
[zane@mixsanders.com](mailto:zane@mixsanders.com)

DATED: September 6, 2019.

  
\_\_\_\_\_  
John R. MacMillan, WSBA #27912  
Of Attorneys for Plaintiff